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**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF UTAH**

In re:

AMMON EDWARD BUNDY,

Debtor.

Bankruptcy No. 24-23530

Chapter 7

Honorable William T. Thurman

**THE ST. LUKE'S PARTIES' MOTION PURSUANT TO FED. R. BANKR. PRO. 2004
FOR AN ORDER AUTHORIZING AN EXAMINATION OF, AND PRODUCTION OF
DOCUMENTS BY, BUNDY FAMILY FOUNDATION WITHOUT PRIOR NOTICE
OR HEARING PURSUANT TO LOCAL RULE 2004-1**

St. Luke's Health System, Ltd., St. Luke's Regional Medical Center, Ltd., Chris Roth, Natasha Erickson, M.D., and Tracy Jungman, NP (together "St. Luke's Creditors"), submit this motion for relief against non-debtor Bundy Family Foundation ("Bundy Family Foundation") under Bankruptcy Rule 2004 and Local Rule 2004-1 as follows.

1. The St. Luke's Creditors are judgment creditors of debtor Ammon Bundy (the "Debtor"). The Debtor committed intentional torts against the St. Luke's Creditors and they obtained a judgment in Idaho in excess of \$50 million against Debtor. As of July 17, 2024 (the "Petition Date"), the Debtor's judgment liability remained in excess of \$50 million.

2. On August 14, 2024, the Chapter 7 Trustee appointed in this case conducted a meeting of creditors under 11 U.S.C. § 341 (the "341 Meeting") during which the Debtor gave incomplete or deficient responses about his assets and pre-petition transfers of the same.

3. Thereafter, the Trustee received communications and obtained information from public records indicating that the Debtor likely has or had interests in business entities and assets that have not been disclosed or were transferred pre-petition. *See e.g.*, Trustee's Motion for Order Authorizing 2004 Exam (the "Trustee's Motion"), Dkt. 47, ¶¶ 5-6.

4. The St. Luke's Creditors similarly have come across information suggesting that the Debtor concealed assets by transferring them to one or more entities he or his associates or his family controls indirectly or directly, including Bundy Family Foundation.

5. The St. Luke's Creditors wish to conduct an examination of Bundy Family Foundation to discover whether Debtor used Bundy Family Foundation to save, conceal and transfer funds that belonged to him.

6. Under Bankruptcy Rule 2004, this Court can empower the St. Luke's Creditors to take discovery from Bundy Family Foundation. Under Local Rule 2004-1, the Court can order such discovery without notice or hearing.

7. The St. Luke's Creditors move this Court to enter an Order authorizing the St. Luke's Creditors to conduct an examination of Bundy Family Foundation and compel production of documents from Bundy Family Foundation.

8. The St. Luke's Creditors will give Bundy Family Foundation no fewer than 14 days' prior written notice of the examination in accordance with Local Rule 2004-1(3)(A).

9. Moreover the St. Luke's Creditors will compel Bundy Family Foundation's attendance by a subpoena in accordance with Bankruptcy Rule 2004(c), Bankruptcy Rule 9106, and Local Rule 2004-1(3)(A).

WHEREFORE, the St. Luke's Creditors seek relief under Bankruptcy Rule 2004 as set forth above without further notice or hearing. A proposed order has been lodged herewith.

DATED this 10th day of December, 2024.

/s/ Erik F. Stidham
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 10th day of December, 2024, I caused the foregoing to be filed electronically through the CM/ECF system, which caused the following parties or counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

Mark C. Rose
McKay, Burton & Thurman, P.C.
trustee@mbt-law.com

U.S. Trustee
USTPRegion19.SK.ECF@usdoj.gov

AND I FURTHER CERTIFY that on such date I served the foregoing on the following non-CM/ECF Registered Participants by U.S. First Class Mail and/or e-mail as indicated:

By U.S. First Class Mail – postage prepaid:

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/s/ Erik F. Stidham
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